UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



NEW ENGLAND – REGION 1 5 Post Office Square, Suite 100 Mail Code OSRR07-4 Boston, MA 02109-3912

July 2, 2015

James Cashwell Olin Corporation 3855 North Ocoee Street Suite 200 Cleveland, TN 37312

Subject: Review and Conditional Approval

Draft Final Remedial Investigation and Risk Assessment Report, Operable Units 1 and 2, MACTEC, April 10, 2014 and Related

Documents.

Dear Mr. Cashwell:

In accordance with Paragraph 40 of the Administrative Settlement Agreement and Order on Consent ("AOC"), Region I of the United States Environmental Protection Agency ("EPA") has completed a review of the Draft Final Remedial Investigation Report for OU1 and OU2, and companion reports for the Human Health and Ecological Risk Assessments dated April 10, 2014 (the "Report"); and a related Response to Comment letter dated December 12, 2014, a Chromium Bioaccumulation Memorandum dated March 26, 2015, and a South Ditch Toxicity Test Memorandum dated April 29, 2015; collectively prepared by Olin/AMEC (the "Documents").

The Report and Documents are the culmination of more than four years of field investigations and more than two years of active review efforts. During the review cycles, numerous comment and response letters were exchanged resulting in supplemental text, tables, and figures. Collectively these Documents must be integrated into the Final Remedial Investigation and Risk Assessment Report for Operable Units 1 and 2.

Conditions

1. <u>Final Remedial Investigation Report</u>. This approval is made with the understanding that Olin will prepare a final RI Report for OU1/OU2 (print and electronic copies), along with new and revised Appendices and Attachments as necessary, which incorporates the comment/responses and supplemental information contained in the Documents. EPA also

requests that the main text of the final RI Report be provided to EPA only in a Microsoft Word file to aid in the development of an anticipated Proposed Plan and Record of Decision. EPA may request source files for specific tables at a later date.

 <u>Draft Feasibility Study</u>. Consistent with a letter issued by EPA on April 14, 2015, the three operable units shall be combined into a single Feasibility Study to be submitted following approval of the anticipated OU3 Remedial Investigation Report.

Please submit the Final Remedial Investigation Report for OU1/OU2 within 90 days.

Sincerely,

James M. DiLorenzo

Remedial Project Manager

USEPA Region 1 - New England

Enclosures:

Cc: Heather Ford, Nobis

Rick Sugatt, EPA Joe Coyne, MassDEP

Jeffrey Hull, Town of Wilmington Martha Stevenson, WERC